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Attorneys for Defendant  
UNITED PUBLIC WORKERS,  
AFSCME, LOCAL 646, AFL-CIO

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

JEANNE ENDO,	)	CIVIL NO. CV03-00563 LEK
	)	
Plaintiff,	)	DEFENDANT UNITED PUBLIC
	)	WORKERS' POSITION
vs.	)	STATEMENT RE: PLAINTIFF'S
	)	MOTION IN LIMINE TO INCLUDE
UNITED PUBLIC WORKERS,	)	EVIDENCE OF THIRD-PARTY
AFSCME LOCAL 646, AFL-CIO,	)	DEFENDANT GARY W.
	)	RODRIGUES' CRIMINAL
Defendant,	)	CONVICTION AS TO THE ISSUE
	)	OF CREDIBILITY; CERTIFICATE
vs.	)	OF SERVICE
	)	
GARY W. RODRIGUES,	)	
	)	
Third-Party Defendant.	)	
	)	TRIAL DATE: May 13, 2008
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DEFENDANT UNITED PUBLIC WORKERS' POSITION STATEMENT RE:  
PLAINTIFF'S MOTION IN LIMINE TO INCLUDE EVIDENCE OF THIRD-  
PARTY DEFENDANT GARY W. RODRIGUES' CRIMINAL CONVICTION  
AS TO THE ISSUE OF CREDIBILITY

Defendant United Public Workers, AFSCME Local 646, AFL-CIO ("UPW") does not oppose PLAINTIFF'S MOTION IN LIMINE TO INCLUDE EVIDENCE OF THIRD-PARTY DEFENDANT GARY W. RODRIGUES' CRIMINAL CONVICTION AS TO THE ISSUE OF CREDIBILITY, filed April 22, 2008. The criminal conviction evidence is also admissible pursuant to FRE Rule 609(a)(2) to impeach any testimony by Gary Rodrigues that UPW agreed to defend and indemnify him in this lawsuit.

DATED: Honolulu, Hawaii, April 29, 2008.

/s/ Charles A. Price

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